

**IN THE UNITED STATES BANKRUPTCY COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA**

In re:	:	
Tiffany C. Johnson	:	Chapter 7
	:	
Debtor(s)	:	Case No.: 21-11333-MDC

**MOTION TO CONVERT BANKRUPTCY CASE FROM A CHAPTER 7 TO A
CHAPTER 13 MATTER**

1. The above referenced Chapter 7 Bankruptcy was filed on or about May 10, 2021.
2. The subject Chapter 7 was filed by the Debtor's undersigned counsel.
3. The Chapter 7 Bankruptcy was assigned case number 21-11333.
4. The Chapter 7 Bankruptcy filing was for the purpose of obtaining a discharge of unsecured debts listed on Schedule "F" of the Debtor's Bankruptcy Petition.
5. The 341 Meeting in the subject matter took place on June 17, 2021.
6. The subject case was converted from a no-asset to an asset case on June 30, 2021 because the Debtor failed to disclose until the subject 341 Meeting that she had an interest in the real estate located and known as 1350 South 51st Street, Philadelphia, PA 19143 within two years of the filing of the instant matter.
7. On or about August 19, 2021 this Court entered an Order approving the Consent Waiver of Chapter 7 Discharge.
8. Through her undersigned counsel the Debtor has been cooperative and communicative with the Chapter 7 Trustee and has been looking into options to satisfy her creditors.

9. At this time the Debtor's household income has increased to the extent she believes that she will be able to satisfy the administrative fees common to a Chapter 13 matter, a reasonable payment to the Chapter 7 Trustee for his services and payment to 100% of the unsecured creditors outstanding at the time of filing the instant matter.

WHEREFORE, based on the reasons detailed in the aforementioned Motion to Convert from a Chapter 7 to a Chapter 13 Bankruptcy, the Debtor, Tiffany C. Johnson, respectfully requests that this Honorable Court enter an Order allowing the conversion to a Chapter 13 Bankruptcy Matter.

DATE: _____

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